



March 25, 2021

VIA ECF

Hon. Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 4B South
Brooklyn, New York 11201

Re: AA Medical, P.C. v. Almansoori
Case No. 20-cv-03852 (DG)(ARL)

Dear Judge Gujarati:

I am incoming counsel for the Plaintiff in the above-referenced matter having very recently been retained on this and other matters pending before Your Honor involving these parties.¹ I have filed an executed Consent to Change Attorney shortly before filing this correspondence.

Based upon a review of the docket, on October 14, 2020, it appears that the Defendant filed a letter requesting a pre-motion conference in anticipation of filing a motion to dismiss the complaint. (ECF Doc. No. 12). However, it also appears that my predecessor counsel failed to file a substantive response on behalf of the Plaintiff.² A pre-motion conference has not yet been scheduled as far as the docket reveals.

Although I am still getting up to speed on this and the other matters referenced herein, it is anticipated that the Plaintiff will need to seek leave to amend the complaint as contemplated by Your Honor's Individual Practice Rules (III)(A)(4). Thus, I respectfully request sufficient time either to formally respond to the Defendant's pre-motion letter or to be permitted to file an amended complaint, as the Court may direct. In addition, if it pleases the Court, I welcome the opportunity to discuss these issues and the other matters on a telephone conference.

I will be filing similar letters in the other matters referenced herein.

¹ See also, 20-cv-04350 and 20-cv-04413.

² Prior correspondence filed by my predecessor counsel in this matter and others, as well as our brief e-mail correspondence, reveal that he was unfortunately enduring serious and dire medical issues involving his son. It appears that these issues may have contributed to missed filings and deadlines in this and other matters. I do not seek to cast aspersions upon my predecessor's abilities and understand he was going through an unfathomable life hardship, but as incoming counsel, I need to minimize the prejudice upon the Plaintiff from counsel's prior actions or inactions.



Hon. Diane Gujarati
March 25, 2021
Page -2-

I thank the Court for its time and consideration in this regard.

Respectfully submitted,

LAW OFFICES OF
DAVID A. ANTWORK, P.C.

David A. Antwork

DAVID A. ANTWORK (DA1168)

cc: Adam I. Kleinberg, Esq. (via ECF)